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Qwest.   
Spirit of Service

November 12, 2002

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**EX PARTE**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**Re: WC Docket No. 02-314 – Application of Qwest  
Communications International Inc. for  
Authorization to Provide In-Region,  
InterLATA Service in the States of Colorado,  
Idaho, Iowa, Montana, Nebraska, North  
Dakota, Utah, Washington and Wyoming**

Dear Ms. Dortch:

In its most recent OSS Reply Declaration, Qwest stated that it “has consistently met the flow-through benchmarks under PO-2B on a regional basis over the past nine months and has steadily improved the rate of [Local Service Requests (“LSRs”)] that it flows through to the [Service Order Processor (“SOP”)] on a state-specific basis during the same period.”<sup>1</sup> Qwest also stated that “[o]n a regional basis, [it] has met, with minor exception, the benchmark for PO-2B-1 and PO-2B-2 for each of the products measured under PO-2 in each of the last nine months.”<sup>2</sup> Qwest submits this filing at the request of Commission staff to clarify these statements.

On a region-wide basis, Qwest’s performance under PO-2B is virtually beyond reproach. From January through September 2002, Qwest missed the PO-2B benchmark *only four times* out of 72 measurement opportunities (PO-2B-1 plus PO-2B-2 for all four products in each of the nine Application states),<sup>3</sup> Moreover, Qwest missed the benchmark in three of the

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<sup>1</sup> See Reply Declaration of Lynn M V Notarianni & Christie L. Doherty, WC Docket No. 02-314 (Oct. 25, 2002) at ¶ 93.

<sup>2</sup> See *id.*

<sup>3</sup> See Regional Commercial Performance Results at 53-56.

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four misses were by less than one percent. <sup>4</sup> This record demonstrates that Qwest clearly is capable of flowing-through commercial volumes of CLEC orders.

On a state-specific basis, Qwest's performance under PO-2B also has been strong, though Qwest sometimes missed the benchmark more frequently. Nevertheless, Qwest met the benchmark under PO-2B in the majority of instances. There have been a total of 565 measurement opportunities (PO-2B-1 plus PO-2B-2 for all four products, counting only those instances in which LSRs were submitted) in the nine Application states from January through September 2002. Of these 565 measurement opportunities, Qwest met the benchmark 459 (81%) times. Twenty-three (4.1%) of the opportunities missed were missed by less than 2%. If one excludes these near-misses and the 41 additional missed opportunities in which only very low volumes of LSRs were submitted by CLECs (less than 20 in the denominator), Qwest met the PO-2B benchmark 91.6% (459/501) of the time in the nine Application states from January through September.

The significance of excluding months in which low volumes of LSRs were received cannot be overstated. It is axiomatic that a small sample size can skew the results of a mathematical analysis. It therefore should be clear that missed opportunities under PO-2B in which low volumes of LSRs were submitted are not representative of Qwest's flow-through capabilities. This is precisely why Qwest's region-wide performance results are significant; they are far more indicative of the company's overall flow-through capabilities because they avoid the problem of low volumes by aggregating LSRs from all 14 states.

Qwest's 14-state aggregate performance results compare favorably to those of other BOCs that have received Section 271 approval. In the recent *Georgia/Louisiana 271 Order*, the Commission found BellSouth's 82.24% aggregate flow-through rate for UNEs sufficient even though BellSouth occasionally – and sometimes consistently – missed the performance benchmark in certain categories. <sup>5</sup> In the *New York 271 Order*, Bell Atlantic's

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<sup>4</sup> See *id.* The fourth miss was by less than five percent. See *id.* at 56,

<sup>5</sup> See *Georgia/Louisiana 271 Order* at ¶ 143, n.507; see *id.* at B-46 (showing an average rate of 73.83% for "% Flow Through Service Requests"(O-3) for Business/Region in Georgia) and C-39 (showing an average rate of 73.83% for the same category in Louisiana).

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flow-through rates were even lower, reaching, for example, only 69.65% for UNEs in September 1999.<sup>6</sup>

Qwest's flow-through rates under PO-2B for the past nine months equal or exceed those of BellSouth in many instances and far exceed the UNE flow-through rate reported by Bell Atlantic in September 1999, soon after which it received its first Section 271 approval. Like Bell Atlantic, the occasions in which Qwest did not meet the flow-through benchmark are *de minimis* and not indicative of Qwest's capabilities.<sup>7</sup>

That Qwest already has demonstrated that certain CLECs have been able to achieve high flow-through rates for every product measured under PO-2B also is instructive.<sup>8</sup> The Commission has repeatedly held that "a BOC is not accountable for orders that fail to flow through due to competing carrier-caused errors."<sup>9</sup> Because certain CLECs have achieved high flow-through rates under PO-2B in Qwest's region, misses in state-specific performance results (which aggregate all CLEC LSRs) should not necessarily be counted against Qwest.

Qwest previously has explained that it incorporates additional up-front edits into every new release of IMA and EDI to improve the likelihood that an LSR will flow-through.<sup>10</sup> We will not repeat that discussion here, except to reiterate that while new releases alone cannot resolve all flow-through discrepancies, the fact that CLECs operating through the EDI

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<sup>6</sup> See Joint Reply Declaration of George S. Dowell and Julie A. Canny, Attachment C at 7.

<sup>7</sup> See generally Qwest II OSS Reply Declaration at ¶¶ 141-173 (citing CLEC-specific flow-through rates under PO-2B); Qwest II OSS Declaration at ¶¶ 282-309; Qwest I OSS Reply Declaration at ¶¶ 5-8; Qwest I OSS Declaration at ¶¶ 301-331.

<sup>8</sup> See Qwest II OSS Reply Declaration at ¶¶ 141-173; Qwest 07/17/02a (Submission of CLEC-Specific Flow-Through (PO.2) and LSR Rejection Rates (PO-4)); Qwest 7/29/02c (Response to FCC on CLEC-specific flow-through rates in June); Qwest 08/12/02 (Response to WCB on CLEC-Specific Flow-Through Order Volumes); Qwest 08/19/02d Ex Parte (Response to FCC on CLEC-Specific Flow-Through Rates and Volumes); Qwest 09/19/02e Ex Parte (Submission of Confidential Information on CLEC-Specific PO-2 and PO-4 Results in Qwest I and Qwest II States).

<sup>9</sup> See *Alabama/Kentucky/Mississippi/North Carolina and South Carolina 271 Order* at App. H, ¶ 152.

<sup>10</sup> See, e.g., Qwest III OSS Reply Declaration at ¶ 94; Qwest II OSS Declaration at ¶ 306.

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interface often delay migrating to new releases contributes to flow-through imbalances. Such CLEC business decisions should not be held against Qwest.

As noted above, Qwest's overall ability to flow-through LSRs on a nondiscriminatory basis is reflected in Qwest's state-specific performance. For the most part, when Qwest missed a benchmark, it often was a near-miss, the result of low volumes, or an isolated incident. The balance of this filing addresses Qwest's state-specific performance by discussing the PO-2B misses cited by Commission staff in its inquiry. For your convenience, an electronic spreadsheet supporting this analysis is attached.

*PO-ZB-1 (GUI) for Resale POTS:* Qwest met the PO-2B-1 benchmark for Resale POTS 64 times out of 81 opportunities in the nine Application states from January through September. Thus, Qwest missed the benchmark 17 times during this period. But seven of those misses were by less than one percent,<sup>11</sup> and an eighth was by less than two percent.<sup>12</sup> If these misses are excluded (as they should be because they are *de minimis*), Qwest met the benchmark 64 times out of 73 (87.7%) opportunities since January and 36 times out of 41 opportunities (87.8%) in the most recent five-month period, May through September 2002.

*PO-2B-1 (GUI) for LNP:* Qwest met the PO-2B-1 benchmark for LNP 52 times out of 81 opportunities in the nine Application states from January through September. Thus, Qwest missed the benchmark 29 times during this period. But 16 of those 29 misses were in months in which fewer than 20 LSRs were submitted, and an additional three misses occurred in months in which 30 or fewer LSRs were submitted.<sup>13</sup> Three additional misses were near-misses.<sup>14</sup> If these low volume and near-miss months are excluded from the analysis, then Qwest met the benchmark 38 times out of 46 opportunities (82.6%) since January and 20 out of 25 opportunities (80%) in the most recent five-month period, May through September 2002.

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<sup>11</sup> See Nebraska (January and July), North Dakota (February). Utah (June), Washington (July and August), Wyoming (January).

<sup>12</sup> See Wyoming (April).

<sup>13</sup> Thirty or fewer LSRs were submitted in Colorado (three months), Iowa (one month), Idaho (five months), Montana (four months), North Dakota (three months), Utah (five months).

<sup>14</sup> See Colorado (May and September) and Iowa (July)

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*PO-2B-1 (GUI) for UNE-PPOTS:* Qwest met the PO-2B-1 benchmark for UNE-P POTS 70 times out of 81 opportunities in the nine Application states from January through September. Thus, Qwest missed the benchmark eleven times during this period. But two of those misses were in months in which fewer than 20 LSRs were submitted,<sup>15</sup> and an additional three misses were by less than 2%.<sup>16</sup> If these low volume and near-miss months are excluded from the analysis, then Qwest met the benchmark 70 times out of 76 opportunities (92.1%) since January and 36 out of 41 opportunities (87.8%) in the most recent five-month period, May through September 2002.

*PO-2B-2 (EDI) for Resale:* Qwest met the PO-2B-2 benchmark for Resale 53 times out of 76 opportunities in the nine Application states from January through September. Thus, Qwest missed the benchmark 23 times during this period. But 16 of those 23 misses were in months in which fewer than 20 LSRs were submitted.<sup>17</sup> Of the remaining seven misses, Qwest missed the benchmark for four by less than two percent, which is *de minimis*.<sup>18</sup> If these low volume and near-miss months are excluded from the analysis, then Qwest met the benchmark 53 times out of 56 opportunities (94.6%) since January and 33 out of 36 opportunities (91.6%) in the most recent five month period, May through September 2002.

*PO-2B-2 (EDI) for UNE-PPOTS:* Qwest met the benchmark 63 out of 74 opportunities in the nine Application states from January through September. Thus, Qwest missed the benchmark 11 times during this period. But two of those 11 misses were in months in which Qwest missed the benchmark by less than 2%.<sup>19</sup> If these near-miss months are excluded from the analysis, Qwest met the benchmark 63 times out of 72 opportunities

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<sup>15</sup> See North Dakota (April) and Wyoming (September)

<sup>16</sup> See Colorado (September), Idaho (September) and Utah (September)

<sup>17</sup> In Utah, for example, CLECs did not submit more than nine Resale LSRs, as measured under PO-2B-2, in any month between January and September. See Utah Commercial Performance Results at 51. In Wyoming, Qwest missed the benchmark in the two **most** recent month, August and September; but these are the same months in which a CLEC initiated service in this region and it is not unusual for flow-through to decline under such circumstances.

<sup>18</sup> See Colorado (February), Idaho (February and September) and Washington (September).

<sup>19</sup> See Idaho (July) and Wyoming (April).

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(87.5%) since January and **42** times out of 44 opportunities (95.5%) in the most recent five month period, May through September 2002.

The 20-page limit does not apply to this filing.

Respectfully submitted,

*Hannee Haney*

cc: E. Yockus  
M. Carowitz  
G. Remondino  
J. Myles  
R. Harsch  
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P. Fahn  
B. Smith  
J. Stanley  
C. Washburn  
S. Vick  
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J. Orchard

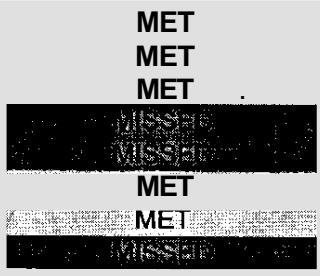
Benchmark	CLEC Result (SEP2002)	CLEC Vol	Month	Met?	Missed by less than 2%?
95.00%	96.76%	2839	Sept	MET	
95.00%	98.78%	1800	Sept	MET	
95.00%	47.18%	142	Sept	MISSED	
95.00%	97.37%	835	Sept	MET	
95.00%	97.37%	952	Sept	MET	
95.00%	96.70%	758	Sept	MET	
95.00%	75.95%	395	Sept	MISSED	
95.00%	97%	2703	Sept	MET	
95.00%	92.42%	66	Sept	MISSED	
95.00%	96.55%	4086	Aug	MET	
95.00%	98.11%	1321	Aug	MET	
95.00%	96.08%	102	Aug	MET	
95.00%	98.43%	2543	Aug	MET	
95.00%	97.43%	1011	Aug	MET	
95.00%	96.37%	1018	Aug	MET	
95.00%	79.85%	392	Aug	MISSED	
95.00%	94.74%	21	10 Aug	MISSED	near miss
95.00%	97.26%	73	Aug	MET	
95.00%	95.43%	3964	Jul	MET	
95.00%	97.38%	2753	Jul	MET	
95.00%	95.57%	203	Jul	MET	
95.00%	97.27%	2196	Jul	MET	
95.00%	96.42%	530	Jul	MET	
95.00%	94.43%	754	Jul	MISSED	near miss
95.00%	78.12%	425	Jul	MISSED	
95.00%	94.33%	2717	Jul	MISSED	near miss
95.00%	95.24%	63	Jul	MET	
90.00%	94.47%	4031	Jun	MET	
90.00%	96.11%	1364	Jun	MET	
90.00%	99%	200	Jun	MET	
90.00%	96.50%	1659	Jun	MET	
90.00%	95.28%	424	Jun	MET	
90.00%	94.98%	1234	Jun	MET	
90.00%	89.95%	368	Jun	MISSED	near miss
90.00%	92.54%	1596	Jun	MET	
90.00%	98.67%	75	Jun	MET	

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90.00%	95.01%	4972	May	
90.00%	97.96%	2447	May	
90.00%	98.60%	215	May	
90.00%	96.07%	1170	May	
90.00%	97.95%	633	May	
90.00%	94.33%	759	May	
90.00%	91.64%	347	May	
90.00%	92.25%	1781	May	
90.00%	100%	44	May	
90.00%	95.85%	4381	Apr	
90.00%	97.39%	2186	Apr	
90.00%	94.97%	199	Apr	
90.00%	95.32%	898	Apr	
90.00%	94.27%	489	Apr	
90.00%	82.20%	500	Apr	
90.00%	95.83%	432	Apr	
90.00%	90.95%	1768	Apr	
90.00%	88.06%	67	Apr	near miss
90.00%	95.83%	4462	Mar	
90.00%	96.84%	3576	Mar	
90.00%	95.92%	147	Mar	
90.00%	95.78%	758	Mar	
90.00%	96.22%	740	Mar	
90.00%	91.73%	399	Mar	
90.00%	96.93%	423	Mar	
90.00%	90.97%	1716	Mar	
90.00%	78.48%	79	Mar	
90.00%	92.16%	3786	Feb	
90.00%	94.50%	1401	Feb	
90.00%	95.63%	183	Feb	
90.00%	96.52%	890	Feb	
90.00%	89.40%	500	Feb	near miss
90.00%	92.36%	406	Feb	
90.00%	95.26%	401	Feb	
90.00%	92.74%	1488	Feb	
90.00%	78.26%	46	Feb	
90.00%	92.13%	5861	Jan	



90.00%	92.87%	3883 Jan
90.00%	94.48%	163 Jan
90.00%	96.52%	892 Jan
90.00%	85.25%	488 Jan
90.00%	89.55%	507 Jan
90.00%	95.49%	554 Jan
90.00%	90.82%	2168 Jan
90.00%	89.16%	83 Jan



near miss

near miss

hmark	CLEC Result (SEP2002)	CLEC Vol	Month	Met'?	Missed by less than 2%?
95.00%	97.12%	1075	Sept	MET	
95.00%	99.28%	695	Sept	MET	
95.00%	94.87%	195	Sept	MISSED	near miss
95.00%	97.89%	285	Sept	MET	
95.00%	98.29%	117	Sept	MET	
95.00%	97.83%	184	Sept	MET	
95.00%	60%	5	Sept	MISSED, Low Volume	
95.00%	94.64%	112	Sept	MISSED	near miss
95.00%	82.84%	204	Sept	MISSED	
95.00%	97.63%	1096	Aug	MET	
95.00%	98.52%	946	Aug	MET	
95.00%	96.54%	260	Aug	MET	
95.00%	98.80%	251	Aug	MET	
95.00%	100%	78	Aug	MET	
95.00%	99.57%	232	Aug	MET	
95.00%	50%	4	Aug	MISSED, Low Volume	
95.00%	96.67%	120	Aug	MET	
95.00%	88.19%	254	Aug	MISSED	
90.00%	95.84%	1058	Jul	MET	
90.00%	94%	150	Jul	MET	
90.00%	95.04%	343	Jul	MET	
90.00%	96.77%	62	Jul	MET	
90.00%	100%	29	Jul	MET	
90.00%	96.03%	252	Jul	MET	
90.00%	33.33%	3	Jul	MISSED, Low Volume	
90.00%	92.16%	51	Jul	MET	
90.00%	91.67%	36	Jul	MET	
90.00%	97.62%	926	Jun	MET	
90.00%	96.77%	124	Jun	MET	
90.00%	95.56%	225	Jun	MET	
90.00%	100%	59	Jun	MET	
90.00%	100%	55	Jun	MET	
90.00%	66.47%	173	Jun	MISSED	
90.00%	40.00%	5	Jun	MISSED, Low Volume	
90.00%	95.95%	74	Jun	MET	
90.00%	100%	3	Jun	MET	



90.00%	66.67%	3 Jan	MISSED, Low Volume
90.00%	30.00%	10 Jan	MISSED, Low Volume
90.00%	100.00%	1 Jan	MET

Rank	CLEC Result (SEP2002)	CLEC Vol	Month	Met?	Missed by less than 2%?
15.00%	94.74%	304	Sept	MISSED	near miss
15.00%	99.01%	302	Sept	MET	
15.00%	80%	5	Sept	MISSED, Low Volume	
15.00%	100%	25	Sept	MET	
15.00%	100%	8	Sept	MET	
15.00%	97.72%	1361	Sept	MET	
15.00%	95.50%	689	Sept	MET	
15.00%	89.01%	91	Aug	MISSED	
15.00%	97.73%	308	Aug	MET	
15.00%	75%	8	Aug	MISSED, Low Volume	
15.00%	90%	30	Aug	MISSED	
15.00%	86%	7	Aug	MISSED, Low Volume	
15.00%	96.68%	1688	Aug	MET	
15.00%	95.08%	834	Aug	MET	
15.00%	90.00%	130	Jul	MISSED	
15.00%	94.65%	299	Jul	MISSED	near miss
15.00%	80%	10	Jul	MISSED, Low Volume	
15.00%	91%	35	Jul	MISSED	
15.00%	92%	12	Jul	MISSED, Low Volume	
15.00%	97.79%	2575	Jul	MET	
15.00%	96.08%	945	Jul	MET	
0.00%	85.59%	111	Jun	MISSED	
0.00%	98.11%	212	Jun	MET	
0.00%	78%	9	Jun	MISSED, Low Volume	
0.00%	94.12%	34	Jun	MET	
0.00%	100%	14	Jun	MET	
0.00%	98.66%	1570	Jun	MET	
0.00%	96.83%	788	Jun	MET	
0.00%	88.15%	135	May	MISSED	near miss
0.00%	98.92%	279	May	MET	
0.00%	67%	6	May	MISSED, Low Volume	
0.00%	92.59%	27	May	MET	
0.00%	90.91%	22	May	MET	
0.00%	98.66%	1413	May	MET	
0.00%	86%	14	May	MISSED, Low Volume	
0.00%	97.06%	1190	May	MET	

CLEC Result (SEP2002)	CLEC Vol	Month	Met?	Missed by less than 2%?
.00%	94.74%	304 Sept	MISSED	near miss
.00%	99.01%	302 Sept	MET	
.00%	80%	5 Sept	MISSED. Low Volume	
.00%	100%	25 Sept	MET	
.00%	100%	8 Sept	MET	
.00%	97.72%	1361 Sept	MET	
.00%	95.50%	689 Sept	MET	
.00%	89.01%	91 Aug	MISSED	
.00%	97.73%	308 Aug	MET	
.00%	75%	8 Aug	MISSED. Low Volume	
.00%	90%	30 Aug	MET	
.00%	86%	7 Aug	MISSED. Low Volume	
.00%	96.68%	1688 Aug	MET	
.00%	95.08%	834 Aug	MET	
.00%	90.00%	130 Jul	MISSED	
.00%	94.65%	299 Jul	MISSED	near miss
.00%	80%	10 Jul	MISSED. Low Volume	
.00%	91%	35 Jul	MISSED	
.00%	92%	12 Jul	MISSED. Low Volume	
.00%	97.79%	2575 Jul	MET	
.00%	96.08%	945 Jul	MET	
.00%	85.59%	111 Jun	MISSED	
.00%	98.11%	212 Jun	MET	
.00%	78%	9 Jun	MISSED. Low Volume	
.00%	94.12%	34 Jun	MET	
.00%	100%	14 Jun	MET	
.00%	98.66%	1570 Jun	MET	
.00%	96.83%	788 Jun	MET	
.00%	88.15%	135 May	MISSED	near miss
.00%	98.92%	279 May	MET	
.00%	67%	6 May	MISSED. Low Volume	
.00%	92.59%	27 May	MET	
.00%	90.91%	22 May	MET	
.00%	98.66%	1413 May	MET	
.00%	86%	14 May	MISSED. Low Volume	
.00%	97.06%	1190 May	MET	

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0.00%	86.00%	100 Apr	MISSED
0.00%	99.29%	425 Apr	MET
0.00%	100%	6 Apr	MET
0.00%	94.12%	17 Apr	MET
0.00%	100%	10 Apr	MET
0.00%	98.55%	1653 Apr	MET
0.00%	100%	4 Apr	MET
0.00%	96.57%	1107 Apr	MET
0.00%	93.75%	80 Mar	MET
0.00%	98.87%	443 Mar	MET
0.00%	67%	3 Mar	MISSED, Low Volume
0.00%	88%	16 Mar	MISSED, Low Volume
0.00%	77%	13 Mar	MISSED, Low Volume
0.00%	98.74%	1504 Mar	MET
0.00%	80%	30 Mar	MISSED
3.00%	98.05%	1232 Mar	MET
0.00%	80.88%	68 Feb	MISSED
0.00%	98.68%	454 Feb	MET
0.00%	38%	8 Feb	MISSED, Low Volume
0.00%	87%	23 Feb	MISSED
0.00%	50%	2 Feb	MISSED, Low Volume
3.00%	98.74%	1584 Feb	MET
0.00%	89%	19 Feb	MISSED, Low Volume
3.00%	97.31%	1377 Feb	MET
3.00%	80.30%	66 Jan	MISSED
0.00%	97.35%	491 Jan	MET
0.00%	0%	1 Jan	MISSED, Low Volume
0.00%	88%	8 Jan	MISSED, Low Volume
3.00%	90.00%	10 Jan	MET
1.00%	98.68%	2192 Jan	MET
0.00%	82%	28 Jan	MISSED
0.00%	96.45%	1043 Jan	MET

neai. miss

Rank	CLEC Result (SEP2002)	CLEC Vol	Month	Met?	Missed by less than 2%?
5.00%	96.06%	3908	Sept	MET	
5.00%	0%	2	Sept	MISSED, Low Volume	
5.00%	0%	1	Sept	MISSED, Low Volume	
5.00%	0%	1	Sept	MISSED, Low Volume	
5.00%	0%	1	Sept	MISSED, Low Volume	
5.00%	97.90%	3234	Sept	MET	
5.00%	93.88%	4594	Aug		near miss
5.00%	100%	1	Aug	MET	
5.00%	95.85%	3063	Jul	MET.	
5.00%	96.55%	3794	Jul	MET	
5.00%	96.82%	2203	Jul	MET	
5.00%	98.06%	3501	Jun	MET	
5.00%	0%	1	Jun	MISSED, Low Volume	
5.00%	0%	1	Jun	MISSED, Low Volume	
5.00%	96.18%	1886	Jun	MET	
5.00%	98.57%	3856	May	MET	
5.00%	98.07%	1138	May	MET	
5.00%	96.05%	3187	May	MET	
5.00%	98.49%	3321	Apr	MET	
5.00%	98.16%	1845	Apr	MET	
5.00%	97%	3032	Apr	MET	
5.00%	97.72%	3290	Mar	MET	
5.00%	98.56%	1594	Mar	MET	
5.00%	97.91%	2252	Mar	MET	
5.00%	96.46%	3196	Feb	MET	
5.00%	97.32%	1308	Feb	MET	
5.00%	97.92%	2212	Feb	MET	
1.00%	94.29%	3505	Jan	MET	
1.00%	96.36%	1375	Jan	MET	
1.00%	96.63%	1720	Jan	MET	



Target	CLEC Result (SEP2002)	CLEC Vol	Month	Met?	Missed by less than 2%?
80.00%	92.27%	453	Sept	MET	
80.00%	97.19%	178	Sept	MET	
80.00%	100%	7	Sept	MET	
80.00%	95.83%	72	Sept	MET	
80.00%	97.03%	337	Sept	MET	
80.00%	93.60%	203	Sept	MET	
80.00%	90.77%	195	Sept	MET	
80.00%	94.58%	480	Sept	MET	
80.00%	89.01%	655	Aug	MET	
80.00%	97.10%	207	Aug	MET	
80.00%	83.33%	6	Aug	MET	
80.00%	91.67%	84	Aug	MET	
80.00%	96.88%	385	Aug	MET	
80.00%	90.38%	260	Aug	MET	
80.00%	92.05%	239	Aug	MET	
80.00%	91.92%	458	Aug	MET	
80.00%	90.29%	515	Jul	MET	
80.00%	92.74%	179	Jul	MET	
80.00%	93.75%	32	Jul	MET	
80.00%	94.74%	95	Jul	MET	
80.00%	90.84%	273	Jul	MET	
80.00%	91.67%	204	Jul	MET	
80.00%	91.57%	166	Jul	MET	
80.00%	84.99%	353	Jul	MET	
70.00%	86.09%	496	Jun	MET	
70.00%	96%	175	Jun	MET	
70.00%	96.67%	30	Jun	MET	
70.00%	100%	117	Jun	MET	
70.00%	89.45%	199	Jun	MET	
70.00%	93.47%	199	Jun	MET	
70.00%	80.70%	228	Jun	MET	
70.00%	82.84%	443	Jun	MET	
70.00%	86.12%	641	May	MET	
70.00%	98.93%	187	May	MET	
70.00%	100%	5	May	MET	
70.00%	93.18%	88	May	MET	

70.00%	80.23%	344 May
70.00%	98.45%	193 May
70.00%	86.86%	274 May
70.00%	63.18%	402 May
70.00%	91.39%	511 Apr
70.00%	84.65%	241 Apr
70.00%	72.73%	22 Apr
70.00%	97.44%	156 Apr
70.00%	82.40%	233 Apr
70.00%	80.09%	216 Apr
70.00%	88.29%	205 Apr
70.00%	79.26%	434 Apr
70.00%	0%	1 Apr
70.00%	92.99%	442 Mar
70.00%	96.18%	157 Mar
70.00%	100.00%	4 Mar
70.00%	91.75%	97 Mar
70.00%	94.33%	194 Mar
70.00%	92.49%	173 Mar
70.00%	96.92%	260 Mar
70.00%	72.32%	448 Mar
70.00%	94.04%	453 Feb
70.00%	87.63%	186 Feb
70.00%	100.00%	11 Feb
70.00%	55.47%	137 Feb
70.00%	83.44%	151 Feb
70.00%	81.25%	224 Feb
70.00%	85.77%	267 Feb
70.00%	75.40%	443 Feb
70.00%	0.00%	4 Feb
70.00%	93.90%	574 Jan
70.00%	94.84%	155 Jan
70.00%	100.00%	7 Jan
70.00%	63.83%	47 Jan
70.00%	88.68%	265 Jan
70.00%	85.21%	169 Jan
70.00%	93.44%	320 Jan

MET
MET
MET
MISSED
MET
MET
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MET
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MET
MISSED, Low Volume
MET
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MISSED, Low Volume
MET
MET
MET
MISSED
MET
MET
MET

70.00%

78.07%

523 Jan

MET

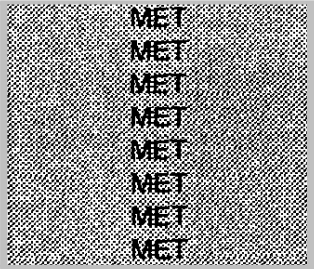
ORIGINAL

	Benchmark	CLEC Result (SEP2002)	CLEC Vol	Month	Met?	Missed by less than 2%?
egate	80.00%	93.32%	1812	Sept	MET	
egate	80.00%	93.32%	794	Sept	MET	
egate	80.00%	91.03%	145	Sept	MET	
egate	80.00%	80%	40	Sept	MET	
egate	80.00%	94.83%	116	Sept	MET	
egate	80.00%	94.15%	410	Sept	MET	
egate	80.00%	91.10%	719	Sept	MET	
egate	80.00%	91.11%	709	Sept	MET	
egate	80.00%	83.78%	37	Sept	MET	
egate	80.00%	94.61%	2207	Aug	MET	
egate	80.00%	96.23%	1298	Aug	MET	
egate	80.00%	85.51%	214	Aug	MET	
egate	80.00%	78.57%	28	Aug	MISS	near miss
egate	80.00%	96.70%	182	Aug	MET	
egate	80.00%	94.08%	557	Aug	MET	
egate	80.00%	91.76%	437	Aug	MET	
egate	80.00%	90.29%	834	Aug	MET	
egate	80.00%	82.61%	46	Aug	MET	
egate	80.00%	88.54%	1867	Jul	MET	
egate	80.00%	93.50%	969	Jul	MET	
egate	80.00%	89.66%	203	Jul	MET	
egate	80.00%	88.06%	67	Jul	MET	
egate	80.00%	95.68%	185	Jul	MET	
egate	80.00%	93.42%	593	Jul	MET	
egate	80.00%	91.16%	509	Jul	MET	
egate	80.00%	90.01%	811	Jul	MET	
egate	80.00%	77.42%	31	Jul	MISS	
egate	70.00%	89.80%	2342	Jun	MET	
egate	70.00%	97.41%	927	Jun	MET	
egate	70.00%	91.59%	107	Jun	MET	
egate	70.00%	96%	25	Jun	MET	
egate	70.00%	100%	84	Jun	MET	
egate	70.00%	95.62%	251	Jun	MET	
egate	70.00%	88.10%	395	Jun	MET	
egate	70.00%	84.54%	977	Jun	MET	
egate	70.00%	92%	25	Jun	MET	

egate	70.00%	94.92%	3029 May
egate	70.00%	97.13%	870 May
egate	70.00%	95.05%	101 May
egate	70.00%	80%	25 May
egate	70.00%	100%	94 May
egate	70.00%	96.65%	358 May
egate	70.00%	87.73%	538 May
egate	70.00%	80.43%	1497 May
egate	70.00%	73.91%	23 May
egate	70.00%	94.06%	2526 Apr
sgate	70.00%	80.21%	1122 Apr
sgate	70.00%	93.81%	194 Apr
agate	70.00%	89.74%	39 Apr
agate	70.00%	90.24%	123 Apr
:gate	70.00%	96.34%	246 Apr
agate	70.00%	91.70%	675 Apr
?gate	70.00%	81.39%	1311 Apr
:gate	70.00%	94.12%	34 Apr
:gate	70.00%	94.69%	1658 Mar
:gate	70.00%	95.59%	657 Mar
:gate	70.00%	92.91%	127 Mar
agate	70.00%	70.00%	20 Mar
:gate	70.00%	93.50%	123 Mar
?gate	70.00%	92.08%	240 Mar
:gate	70.00%	90.44%	293 Mar
:gate	70.00%	74.12%	823 Mar
?gate	70.00%	84.62%	26 Mar
?gate	70.00%	92.19%	1755 Feb
!gate	70.00%	94.70%	604 Feb
!gate	70.00%	90.24%	123 Feb
!gate	70.00%	97.87%	47 Feb
!gate	70.00%	74.29%	70 Feb
!gate	70.00%	85.12%	719 Feb
!gate	70.00%	86.42%	265 Feb
!gate	70.00%	78.35%	1007 Feb
:gate	70.00%	90.24%	41 Feb
:gate	70.00%	92.15%	2521 Jan

ORIGINAL

regate	70.00%	96.64%	1308 Jan
regate	70.00%	95.62%	593 Jan
regate	70.00%	100.00%	21 Jan
regate	70.00%	88.92%	316 Jan
regate	70.00%	94.84%	1 Jan
regate	70.00%	86.10%	295 Jan
regate	70.00%	89.11%	1148 Jan
regate	70.00%	100.00%	23 Jan



chnr	mark	CLEC Result (SEP2002)	CLEC Vol	Month	Met7	Missed <b>by less</b> than 2%?
90.00%		89.73%	1042	Sept	MISSED	near miss
90.00%		97.14%	35	Sept	MET	
90.00%		88.89%	90	Sept	MISSED	near miss
90.00%		97.44%	39	Sept	MET	
90.00%		93.89%	180	Sept	MET	
90.00%		98.46%	1106	Sept	MET	
90.00%		88.01%	367	Sept	MISSED	near miss
90.00%		90.41%	1679	Sept	MET	
90.00%		72.73%	11	Sept	MISSED, Low Volume	
90.00%		86.62%	942	Aug	MISSED	
90.00%		97.14%	35	Aug	MET	
90.00%		97.96%	49	Aug	MET	
90.00%		100%	40	Aug	MET	
90.00%		80.95%	42	Aug	MISSED	
90.00%		98.49%	926	Aug	MET	
90.00%		91.46%	164	Aug	MET	
90.00%		85.67%	1452	Aug	MISSED	
90.00%		90%	10	Aug	MET	
90.00%		85.38%	1163	Jul	MISSED	
90.00%		96.30%	27	Jul	MET	
90.00%		93.42%	76	Jul	MET	
90.00%		96.88%	32	Jul	MET	
90.00%		91.18%	34	Jul	MET	
90.00%		94.67%	525	Jul	MET	
90.00%		91.81%	171	Jul	MET	
90.00%		84.45%	1222	Jul	MISSED	
90.00%		100%	5	Jul	MET	
75.00%		88.64%	1109	Jun	MET	
75.00%		90.70%	43	Jun	MET	
75.00%		97.25%	109	Jun	MET	
75.00%		91.67%	36	Jun	MET	
75.00%		90%	20	Jun	MET	
75.00%		93.33%	135	Jun	MET	
75.00%		86.78%	227	Jun	MET	
75.00%		88.52%	1019	Jun	MET	
75.00%		100%	14	Jun	MET	

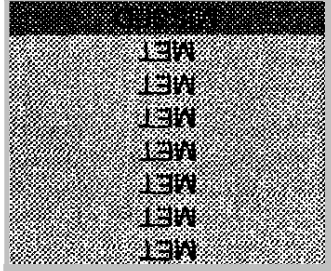
75.00%	91.20%	909	May	MET
75.00%	89.09%	55	May	MET
75.00%	95.50%	111	May	MET
75.00%	85.29%	68	May	MET
75.00%	92.11%	38	May	MET
75.00%	94.69%	207	May	MET
75.00%	90.95%	243	May	MET
75.00%	87.80%	1303	May	MET
75.00%	100%	24	May	MET
75.00%	88.81%	1108	Apr	MET
75.00%	92.71%	96	Apr	MET
75.00%	94.12%	85	Apr	MET
75.00%	89.58%	48	Apr	MET
75.00%	40%	15	Apr	MISSED, Low Volume
75.00%	95.36%	647	Apr	MET
75.00%	95.77%	260	Apr	MET
75.00%	84.15%	1060	Apr	MET
75.00%	88.24%	17	Apr	MET
75.00%	87.99%	741	Mar	MET
75.00%	91.18%	34	Mar	MET
75.00%	97.46%	118	Mar	MET
75.00%	96.15%	52	Mar	MET
75.00%	94.44%	18	Mar	MET
75.00%	95.60%	386	Mar	MET
75.00%	90.48%	189	Mar	MET
75.00%	76.92%	1174	Mar	MET
75.00%	100.00%	12	Mar	MET
75.00%	89.05%	548	Feb	MET
75.00%	94.74%	19	Feb	MET
75.00%	93.44%	61	Feb	MET
75.00%	94.87%	39	Feb	MET
75.00%	75.00%	28	Feb	MET
75.00%	97.26%	1243	Feb	MET
75.00%	89.80%	147	Feb	MET
75.00%	78.08%	835	Feb	MET
75.00%	100.00%	14	Feb	MET
75.00%	86.35%	608	Jan	MET



75.00%  
75.00%  
75.00%  
75.00%  
75.00%  
75.00%  
75.00%  
75.00%

93.48%  
83.80%  
89.23%  
81.48%  
90.23%  
88.15%  
75.29%  
53.85%

46 Jan  
142 Jan  
65 Jan  
27 Jan  
57 Jan  
211 Jan  
963 Jan  
26 Jan



Benchmark	CLEC Result (SEP2002)	CLEC Vol	Month	Met?	Missed by less than 2%?
90.00%	92.84%	433	Sept	MET	
90.00%	90.32%	31	Sept	MET	
90.00%	90.63%	96	Sept	MET	
90.00%	95.91%	220	Sept	MET	
90.00%	100%	13	Sept	MET	
90.00%	100%	39	Sept	MET	
90.00%	91.26%	536	Sept	MET	
90.00%	92.03%	364	Sept	MET	
90.00%	100%	25	Sept	MET	
90.00%	90.89%	461	Aug	MET	
90.00%	95.92%	49	Aug	MET	
90.00%	94.37%	142	Aug	MET	
90.00%	91.83%	257	Aug	MET	
90.00%	96.88%	32	Aug	MET	
90.00%	100%	15	Aug	MET	
90.00%	90.21%	337	Aug	MET	
90.00%	90.48%	441	Aug	MET	
90.00%	96.15%	26	Aug	MET	
90.00%	87.69%	642	Jul	MISS	
90.00%	94.44%	72	Jul	MET	
90.00%	88.46%	182	Jul	MISS	
90.00%	90.79%	152	Jul	MET	
90.00%	90.63%	32	Jul	MET	
90.00%	90.91%	11	Jul	MET	
90.00%	91.10%	427	Jul	MET	
90.00%	87.27%	660	Jul	MISS	
90.00%	97.06%	34	Jul	MET	
75.00%	85.12%	645	Jun	MET	
75.00%	92.75%	69	Jun	MET	
75.00%	94.74%	209	Jun	MET	
75.00%	84.92%	179	Jun	MET	
75.00%	100%	17	Jun	MET	
75.00%	100%	6	Jun	MET	
75.00%	86.44%	435	Jun	MET	
75.00%	83.98%	593	Jun	MET	
75.00%	100%	14	Jun	MET	

near miss

ORIGINAL

75.00%	81.64%	659 May
75.00%	96.69%	151 May
75.00%	88.95%	172 May
75.00%	83.68%	435 May
75.00%	98.11%	53 May
75.00%	83.33%	12 May
75.00%	90.69%	290 May
75.00%	83.38%	746 May
75.00%	81.25%	32 May
75.00%	90.77%	271 Apr
75.00%	83.16%	190 Apr
75.00%	85.32%	293 Apr
75.00%	85.71%	14 Apr
75.00%	89.10%	266 Apr
75.00%	69.39%	379 Apr
75.00%	73.33%	60 Apr
75.00%	89.66%	319 Mar
75.00%	84.66%	163 Mar
75.00%	91.29%	310 Mar
75.00%	100.00%	1 Mar
75.00%	100.00%	9 Mar
75.00%	89.09%	220 Mar
75.00%	80.38%	265 Mar
75.00%	67.39%	46 Mar
75.00%	80.32%	315 Feb
75.00%	72.40%	221 Feb
75.00%	82.70%	185 Feb
75.00%	89.47%	19 Feb
75.00%	79.48%	307 Feb
75.00%	71.38%	290 Feb
75.00%	67.21%	61 Feb
75.00%	77.86%	411 Jan
75.00%	83.38%	325 Jan
75.00%	84.86%	185 Jan
75.00%	83.33%	18 Jan
75.00%	81.52%	433 Jan
75.00%	68.56%	353 Jan

75.00%

52.94%

28 Jan

